EXHIBIT D

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May 8, 2012

VIA ELECTRONIC MAIL

Lee H. Rubin, Esq.
Mayer Brown LLP
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, CA 94306-2112

> Re: *In re: High-Tech Employee Antitrust Litigation,*
>   **Master Dkt. No. 11-cv-2509 (N.D. Cal.)**

Dear Mr. Rubin:

I write on behalf of Plaintiffs in the above-captioned matter in response to Google Inc's ("Google") production of data with the following file names:

> GOOG-HIGH TECH-00054553-Employee_data; and
> GOOG-HIGH TECH-00054554-Applicant_data.

First, please let us know by tomorrow, May 9, 2012, whether Google has finished producing data responsive to Plaintiffs' requests, and if not, by what date Google's data production will be complete. Please note that Exhibit 1 to this letter lists categories of data that have not been produced and that were included in Plaintiffs' requests for production. Of particular note is that Google has not produced employee-level personnel data, which was requested by Plaintiffs and which Google agreed to produce. Further, Google has not produced all hiring and recruiting data for the Relevant Period. Given the fast-approaching class certification deadlines, it is imperative that Google produce all relevant data immediately.

Second, Exhibit 1 contains a list of questions concerning Google's data. Given the nature and scope of Plaintiffs' questions, Plaintiffs believe that the most productive way to address these questions would be through a teleconference involving Plaintiffs' counsel, a staff member of Plaintiffs' consulting expert, and a representative of Google who is knowledgeable about the

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data produced by Google. Please propose a time this week or next week when Google will make available a person knowledgeable about the data produced in this litigation for such a teleconference.

Thank you, and please feel free to contact me with any questions.

Sincerely,

Daniel J. Walker

cc: Dean Harvey

Enclosure

<div align="right">**Exhibit 1 to May 8, 2012 Walker Letter**</div>

I.   **Employee Data Questions & Issues Relating to GOOG-HIGH TECH-00054553-Employee_data and GOOG-HIGH TECH-00054554-Applicant_data.**

     A.   No employee-level personnel data have been produced to date. <u>Please produce employee-level personnel data as requested previously.</u>

II.   **Hiring and Recruiting Data**

     Questions relating to GOOG-HIGH TECH-00054553-Employee_data:

     A.   The data runs from 2001 to 2010. Please produce hiring and recruiting data for the entire Relevant Period as previously requested.

     B.   Please explain what the following fields represent:

          1.   p.workexp_company_1

          2.   p.workexp_company_2

     C.   Provide a lookup table for the values listed in the field "m.location_code".

     D.   Please provide the following fields:

          1.   Salary at previous employer

          2.   Originated through (e.g., cold call by recruiter, applied on website, on campus recruiting, etc.)

          3.   Job title

          4.   Education (e.g., engineering undergraduate, engineering graduate degree, MBA, etc.)

     Questions relating to GOOG-HIGH TECH-00054554-Applicant_data:

     A.   Please define the following values found in the field "a.application_type":

          1.   Direct Employee Applicant

          2.   Employee Rehire

          3.   Intern Conversion

          4.   Intern Rehire

          5.   Internal Transfer

          6.   M&A Applicant

Exhibit 1 to May 8, 2012 Walker Letter

7. New Grad

8. Temp Conversion

9. Temp Rehire

B.   Please provide supplemental data containing the list of additional fields as requested below:

1. Employer at time of application

2. Outcome (e.g., hired, interviewed, rejected, etc.)

3. Original through (e.g., cold call by recruiter, applied on website, on-campus recruiting, etc.)

4. Number of cold call made by recruiters each month broken down by:

   i.   Cold callee's employer at time of contact

   ii.   Position recruited for

   iii. Cold callee's education (*e.g.*, engineering undergraduate, engineering graduate degree, MBA, etc.)

   iv.   Cold callee's position at time of contact

   v.   Cold callee's salary history

   vi.   Cold callee's years of experience

   vii. Outcome (e.g., not interested, requested additional information, submitted resume, hired, rejected, etc.)